



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
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March 20, 2015

**Via ECF**

Hon. Nicholas G. Garaufis  
United States District Court Judge  
Eastern District of New York  
United States Courthouse  
225 Cadman Plaza East  
Room 1416 S  
Brooklyn, New York 11201

Hon. Robert M. Levy  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: SEC v. Zev Saltsman, et al. 07 Civ. 4370 (NGG)(RML)**

Dear Judge Garaufis:

By order dated February 11, 2008, the Court stayed discovery in the above-referenced action pending resolution of the criminal matter captioned *United States v. Zev Saltsman et. al*, 07-CR-641 (S-1) (NGG) and also stayed all defendants time to answer, move, or otherwise respond. With the sentencing of Defendant Andy Brown, the criminal case has been resolved against all defendants with the exception of Defendant Menachem Eitan who is a fugitive and may never be criminally prosecuted. The SEC, therefore, requests that the stay be lifted. The SEC has conferred with the United States Attorney's Office for the Eastern District of New York ("USAO"), upon whose motion the stay was granted. The USAO consents to the lifting of the stay. The defendants who have appeared in this case also consent to the lifting of the stay.

We also wish to advise the Court that on Monday, March 23, 2015, the SEC will be filing an amended complaint in this case. At a July 9, 2014, conference before Magistrate Judge Levy, the parties agreed to confer as to purported pleading deficiencies claimed by certain defendants so that the Commission could amend its complaint and try to avoid (or limit) motion practice. Magistrate Judge Levy also authorized the parties to take the deposition of Defendant Zev Saltsman.

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We thank the Court for its consideration of the SEC's motion to lift the stay.

Respectfully submitted,

/s/ Todd D. Brody

Todd D. Brody

Senior Trial Counsel

cc: All counsel (via email)